REMARKS

Claims 1-20 are currently pending in the application. Claims 1 and 12-13 have been amended. No claims have been canceled. Applicant respectfully submits that no new matter has been added. Applicant respectfully requests reconsideration of the application in view of the foregoing amendments and the following remarks.

Claims 1-11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,832,447 to Rieker et al. ("Rieker"), in view of U.S. Patent No. 6,067,522 to Warady et al. ("Warady"), and further in view of U.S. Patent No. 6,601,020 to Myers ("Myers").

Independent claim 1 relates to a computer system for use in a web-based managed care transaction system. Applicant respectfully submits that the cited combination of Rieker, Warady, and Myers fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 1, namely, a set of linked data tables organized into a logical entity and a set of one or more member history tables associated with a member table, each member history table associated with a given employer plan, wherein the logical entity is persistent over changes to each members' changes within an employer plan. In addition, the cited references fail to disclose wherein a web-based managed care transaction system is adapted to provide, via the linked set of data tables, a history of healthcare benefits of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the history of healthcare benefits via a web browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member.

The Examiner acknowledges that the combination of Rieker and Warady fails to disclose a master account table including account setup information for at least one of utilization and login actions for said web-based managed care transaction system and a member table including identity information for the at least one member. The Office Action asserts that Myers teaches these features on Col. 8, lines 28-67 and Col. 9, line 40. Applicant respectfully disagrees, and points out that Myers discloses a load testing system (LTS) that includes a public Web layer for

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providing a log-in page so that existing users may access the secure Web layer using their unique User identifier, User name, and password but fails to disclose *a web-based managed care transaction system for providing a history of healthcare benefits of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the history of healthcare benefits via a web browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member* as claimed.

Additionally, in contrast to claim 1, Rieker discloses a method and apparatus for automatically determining in real-time whether a patient at a health care facility has health insurance coverage. Rieker fails to disclose a set of linked data tables organized into a logical entity, a set of one or more member history tables associated with the member table, each member history table associated with a given employer plan, wherein the logical entity is persistent over changes to each members' changes within an employer plan. Rieker further fails to disclose wherein a web-based managed care transaction system is adapted to provide, via the linked set of data tables, a history of healthcare benefits of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the history of healthcare benefits via a web browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member. Rieker discloses an *insurance eligibility verification system* but fails to disclose *a web-based managed care transaction system for providing a history of healthcare benefits of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the history of healthcare benefits via a web browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member* as claimed.

Furthermore, Warady discloses a health and welfare benefit enrollment and billing system and method, wherein at least one person is enrolled in at least one health and welfare benefit plan provided by at least one health and welfare benefit plan provider. A bill is generated for fees due to the at least one health and welfare benefit plan provider as a result of an

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enrollment of the at least one person in the at least one health and welfare benefit plan. In contrast, Warady fails to disclose *a web-based managed care transaction system for providing a history of healthcare benefits of the at least one member throughout their life and wherein the web-based managed care transaction system is adapted to allow the at least one member to review and manage the history of healthcare benefits via a web browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member* as claimed.

Applicant respectfully submits that independent claim 1 distinguishes over the cited combination of Rieker, Warady, and Myers. Withdrawal of the rejection of independent claim 1 is respectfully requested.

Dependent claims 2-11 depend from and further restrict independent claim 1 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 2-11 distinguish over Rieker, Warady, and Myers and are in condition for allowance. Withdrawal of the rejection of dependent claims 2-11 is respectfully requested.

Claims 12-20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Myers, Rieker, Warady, and further in view of U.S. Patent No. 6,263,330 to Bessette ("Bessette").

Independent claim 12 relates to a web-based managed care transaction system accessible over a computer network using a client browser. Applicant respectfully submits that the cited combination of Rieker, Warady, and Myers fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 12, namely, a database for storing a set of linked data tables organized into a persistent logical entity wherein the logical entity maintains data on each member in spite of status changes. In addition, the cited combination of Rieker, Warady, and Myers fails to disclose wherein the web-based managed care transaction system is adapted to provide, via the linked set of data tables, a history of healthcare benefits of the at least one member throughout their life and wherein the web-based managed care

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transaction system is adapted to allow the at least one member to review and manage the history of healthcare benefits via the client browser, the history of healthcare benefits including past and present healthcare benefits of the at least one member. Bessette fails to cure the deficiencies of Rieker, Warady, and Myers noted above. Furthermore, Applicant submits that claim 12 patentably distinguishes over the cited references for similar reasons to those discussed above with respect to independent claim 1. Withdrawal of the rejection of independent claim 12 is respectfully requested.

Independent claim 13 relates to a network-based managed care system. Applicant respectfully submits that the cited combination of Rieker, Warady, and Myers fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 13, namely, wherein the network-based managed care system is adapted to provide, via a database, a history of healthcare benefits of the at least one member throughout their life and wherein the history of healthcare benefits include past and present healthcare benefits of the at least one member. Bessette fails to cure the deficiencies of Rieker, Warady, and Myers noted above. Furthermore, Applicant submits that claim 13 patentably distinguishes over the cited references for similar reasons to those discussed above with respect to independent claims 1 and 12. Withdrawal of the rejection of independent claim 13 is respectfully requested.

Dependent claims 14-20 depend from and further restrict independent claim 13 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 13, dependent claims 14-20 distinguish over the cited references and are in condition for allowance. Withdrawal of the rejection of dependent claims 14-20 is respectfully requested.

In view of the above amendment, Applicant respectfully submits that the present application is in condition for allowance. A Notice to that effect is respectfully requested.

Dated: June 6, 2007

Respectfully submitted,

By _____
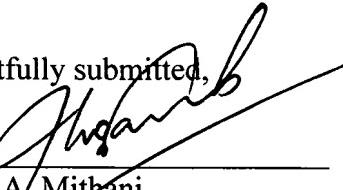
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